

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|--------------------------------------|------------------------------|
| U.S. BANK NATIONAL ASSOCIATION,) | |
| AS TRUSTEE FOR BNC MORTGAGE) | |
| LOAN TRUST 2007-1 MORTGAGE PASS-) | Case No: 1:13-CV-1798 |
| THROUGH CERTIFICATES, SERIES 2007-) | |
| 1) | |
| Plaintiff, |) |
| V. |) |
| |) |
| JUAN BURGIN, FIA CARD SERVICES,) | Judge: Ruben Castillo |
| NATIONAL ASSOCIATION AS) | |
| SUCCESSOR IN INTEREST TO BANK OF) | |
| AMERICA, N.A. (USA), SIMYRA ROSS) | |
| Defendants. |) |

MOTION FOR JUDGMENT OF FORECLOSURE

NOW COMES the Plaintiff, U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR BNC MORTGAGE LOAN TRUST 2007-1 MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-1, by and through its attorney, Megan Christine Adams, and moves this Honorable Court for Entry of Judgment of Foreclosure. In support thereof, Plaintiff states as follows:

1. Attached please find Plaintiff's Affidavit of Prove-up attached hereto as Exhibit 1.
2. Attached please find Plaintiff's Certificate of Prove-up of Foreclosure Fees and Costs attached hereto as Exhibit 2.

WHEREFORE, Plaintiff respectfully requests that its Motion for Entry of Judgment of Foreclosure be Granted, that this Court enter a judgment of foreclosure in favor of Plaintiff, enter an award of \$188,483.42 as of September 20, 2013, with interest accruing on the unpaid principal balance at \$36.43 per day, plus attorney's fees and foreclosure costs of \$1,247.50, incurred by the Plaintiff as a result of the foreclosure, and all other relief just and proper.

Respectfully submitted,

By: /s/ Megan Christine Adams

Potestivo & Associates, P.C.
Megan Christine Adams (ARDC#6312221)
223 W. Jackson Blvd., Suite 610
Chicago, Illinois 60606
Telephone: (312) 263-0003
Main Fax: (312) 263-0002
Our File No.: C14-96371